

REMARKS

Claims 1-24 are pending in this application. For purposes of expedition, claims 1-2, 5-6, 13, 17 and 21 have been amended in several particulars for purposes of clarity and brevity in accordance with current Office policy, to further and alternatively define Applicants' disclosed invention and to assist the Examiner to expedite compact prosecution of the instant application.

Claims 1-24 have been rejected under 35 U.S.C. §102(e) as being anticipated by Suzuki, U.S. Patent No. 6,763,178 for reasons stated on pages 5-10 of the final Office Action (Paper No. 20070316). While Applicants disagree with the Examiner's assessment of the use of a "GRAPHICS_HEADER file", as shown in FIG. 3A, FIG. 5A, FIG. 7A, FIG. 9A, and FIG. 9C., independent claims 1, 5, 13, 17 and 21 have been amended to distinguish over Suzuki '178. For example, base claims 1, 5, 13, 17 and 21 have been amended to define the specific of the "navigation information" that is generated by a recording apparatus when the main data and the sub data are recorded in different areas on the data storage medium, to define the relation required for the main data and the sub data for searching and content reproduction, but also contains identifiers to identify particular bitstreams of the main data and the sub data [as well as the extra data] recorded in different areas on the data storage medium for searching and content reproduction, and playback time information for the sub data corresponding to the main data.

In contrast to Applicants' base claims 1, 5, 13, 17 and 21, Suzuki '178 discloses a method and apparatus, as shown in FIG. 1, for recording video with superimposed sub-information. According to Suzuki '178, a personal computer (PC) 31, as shown in FIG. 1, is used to allow the user to specify when and where (on the main image) the sub-images are to be superimposed.

During recording, main data consisting of main video and audio data is compression encoded, multiplexed and recorded on a record medium 1, such as a magnetic or optical disk, as shown in FIG. 1, via an encoder 18, as shown in FIG. 13. In contrast to the main data, sub-image data is separately arranged and recorded on the recording medium 1 as one or more graphics files separate from the main data, where the sub-image data represents sub-images to be superimposed with the main data. Those sub-image data files are arranged as

"GRAPHICS_BODY_files", as shown in FIG. 2.

During reproduction, the sub-image data is read from the record medium at different times than the main data, and buffered separately. An adder 12, as shown in FIG. 1, is then used to combine the main data supplied from audio/video decoders 10 and 11, and the sub-image data (GRAPHICS_BODY_files) from the graphics decoder 15 and generate composite video data to be displayed. Since the arrangement and recording of the sub-image data (GRAPHICS_BODY_files) are done in separate files from the main data, editing and playback operations of such sub-image data (GRAPHICS_BODY_files) can be simplified. See Abstract; col. 2, lines 63-65. Various editing techniques for only the sub-image data are shown in FIGS. 5-10, in which different pages of sub-information can be edited, such as Page A, Page B and Page C, shown in FIGS. 3A-3B and FIGS. 7A-7B, or Page A, Page B, Page C and Page D, as shown in FIGS. 5A-5B, using information from the GRAPHICS_HEADER_files. Editing tasks may include page editions, deletions and splitting.

For example, as shown in FIG. 5, a Page D is added between Pages B and C, i.e., the presentation time of Page D is to lie between that of Pages B and C. Changes can be made at each individual page of sub-image data (GRAPHICS_BODY_files).

However, the GRAPHICS_HEADER_files of Suzuki '178 are **not** used to define relation between the main data and the sub data to be reproduced in synchronization, as allegedly by the Examiner; rather, these GRAPHICS_HEADER files are used to allow the user to perform editing tasks such as page editions, deletions, and splitting, only with respect to the individual page of sub-images (GRAPHICS_BODY_files).

Moreover, the GRAPHICS_HEADER_files of Suzuki '178 do not contain "identifiers to identify particular bitstreams of the **main data** and the **sub data** [as well as the **extra data**] recorded in different areas on the data storage medium for searching and content reproduction" as expressly defined in each of Applicants' base claims 1, 5, 13, 17 and 21. This is because the GRAPHICS_HEADER_files of Suzuki '178 are only used to identify the address of different pages of the sub-image data (GRAPHICS_BODY_files), and **not** any particular bitstream of both the main data and the sub data [as well as any extra data], as shown in FIG. 2 of Applicants' disclosed invention.

On page 4 of the Office Action (Paper No. 20070316), the Examiner asserts that Suzuki '178 teaches that,

"each GRAPHICS header file has a unique name as can be seen in Figure 2 (GRAPHICS_001.header, GRAPHICS_002.header ...). Each of the files is recorded separately on the medium, and therefore are stored in separate bitstreams."

However, the Examiner's assertion is now unwarranted, particularly, in view of the changes made to base claims 1, 5, 13, 17 and 21, and in view of the fact that these GRAPHICS_HEADER_files can only be used to address the pages of sub-image data (GRAPHICS_BODY_files), and **not** any particular bitstream of both the main data and the sub data [as well as any extra data], as shown in FIG. 2 of Applicants' disclosed invention.

In view of these noted deficiencies of Suzuki '178, Applicants respectfully request that the rejection of claims 1-24 be withdrawn.

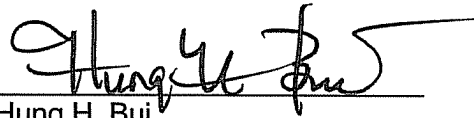
In view of the foregoing amendments, arguments and remarks, all claims are deemed to be allowable and this application is believed to be in condition to be passed to issue. Should any questions remain unresolved, the Examiner is requested to telephone Applicants' attorney at the Washington DC office at (202) 216-9505 ext. 232.

To the extent necessary, Applicants petition for an extension of time under 37 CFR §1.136. If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

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